

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EDUARDO ANDRE ELY

Plaintiff,

v.

**The Partnerships and Unincorporated
Associations Identified On Schedule A,**

Defendants.

Case No. 1:25-cv-03988

Hon. Lindsay C. Jenkins

DECLARATION

I, Wang Yan, being of lawful age and under penalty of perjury, hereby declare and state as follows based on my personal knowledge:

1. I am the corporate representative of defendant AATBR (“Defendant”) in this instant case.
2. Defendant maintains no offices, employees, agents, bank accounts, warehouses, inventory, or real or personal property, or advertising in Illinois.
3. Defendant has never registered to do business in Illinois or any other U.S. state.
4. I have never traveled to the United States. Neither I nor Defendant has ever directed marketing, advertising, or promotions specifically to Illinois residents or targeted Illinois in any way.
5. Defendant has e never filed a lawsuit in Illinois.
6. Neither Defendant nor I have never paid taxes in Illinois

7. Neither Defendant nor I have never contracted with any internet service provider located in Illinois.

8. Neither Defendant nor I have never purchased goods or services from any entities or individuals located in Illinois.

9. Defendant's Temu storefront and the accused products contain no content directed specifically at Illinois residents or residents of any U.S. state.

10. Based on a thorough review of Defendant's sales records, I confirm that the accused product has not been shipped to the United States. The sales data has been provided to Plaintiff, who is also able to obtain the sales data from Temu.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed on May 7, 2025, in Wuhan, China

Declarant: Wang Yan (signature)

Print Name: Wang Yan

Date: 5/7/2025